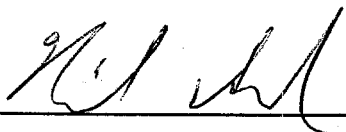


**THE CONTENTS OF THIS DOCUMENT ARE  
THE HIGHEST QUALITY AVAILABLE**

INITIAL KH DATE 3-3-05

This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.



Date

2/15/2005



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead  
Environmental Restoration Program  
U.S. Department of Energy  
Idaho Operations Office  
1955 Fremont Avenue  
Idaho Falls, Idaho 83401-1216

**Re: Correction of previously signed Decision Statements for Track 1s**

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

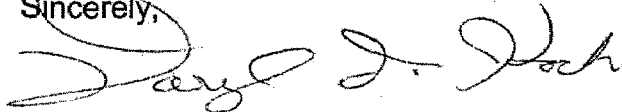
On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program  
November 8, 2004  
Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daryl F. Koch".

Daryl F. Koch  
FFA/CO Manager

DK/jc

cc: Nicholas Ceto, U.S. EPA Region 10, Richland, WA  
Dennis Faulk, U.S. EPA Region 10, Richland, WA  
Kathy Ivy, U.S. EPA Region 10, Seattle, WA  
Mark Shaw, DOE, Idaho Falls  
Margie English, DEQ, Boise, ID

*DOE/ID-10887*  
*August 2001*

## **Site 021 Track 1 Decision Documentation Package, OU 10-08**

**DECISION DOCUMENTATION PACKAGE  
COVER SHEET**

Prepared in accordance with

**TRACK 1 SITES:  
GUIDANCE FOR ASSESSING  
LOW PROBABILITY HAZARD SITES  
AT THE INEEL**

**Site Description:** Stains on Road T17 from Portland Avenue to the Back Side of the Former Experimental Organic Cooled Reactor/Security Training Facility

**Site ID:** 021

**Operable Unit:** 10-08

**Waste Area Group:** 10

**I. SUMMARY – Physical description of the site:**

Site 021 consists of stained soil areas on Road T17, a dirt access road that leads from Portland Avenue to the back side of the former Experimental Organic Cooled Reactor (EOCR)/Security Training Facility (STF). The road is stained with what appears to be an oil-like substance. The EOCR/STF is located approximately 2.5 miles east of Central Facilities Area at the INEEL. The EOCR/STF area was closed in 1990 and subsequently decontaminated and decommissioned in 1999. The road is not currently open to general traffic.

This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure (MCP)-3448, *Reporting or Disturbance of Suspected Inactive Waste Sites*, a new site identification form was completed for this site. As part of the process, a field team wrote a site description, and collected photographs and global positioning system (GPS) coordinates for the site. The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

The site investigation revealed that the dirt road was stained intermittently with an oil-like substance for a distance of approximately 1-1/2 miles. The stains were estimated to be 1-2 inches deep, and appeared to be contained within the dirt/gravel road surface. There was no visual evidence of contaminant migration. Vegetation was well established along the roadsides adjacent to the stains. No oil odor was detected upon inspection of Site 021; however, no field screening was conducted for radionuclides or other hazardous constituents.

Interviews with INEEL personnel revealed that oils were historically collected from various onsite sources, stored in a central collection area, and subsequently sprayed on INEEL roads as a means of disposal and dust suppression (a practice discontinued after the Toxic Substance Control Act came into affect in 1976). There was concern that the oil might have contained polychlorinated biphenyls (PCBs) from transformers. It was suspected that Road T17 had been sprayed in this manner, and as a precautionary measure, two composite soil samples were collected on April 3, 1995 at Site 021 and analyzed for PCBs. A review of the data indicates that PCBs were not detected in either sample. The samples were not analyzed for organics, metals, radionuclides, or other hazardous constituents. A copy of the data is provided as backup in this Track 1 package.

## DECISION RECOMMENDATION

### II. SUMMARY - Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial, or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations and photographs revealed no visual evidence of hazardous substances that present a danger to human health or the environment. Therefore, the overall qualitative risk is low.

The reliability of information provided in this report is high. Field investigations and subsequent sampling results revealed this site does not present a danger to human health or the environment for PCBs. Although the samples were not analyzed for organics, metals, radionuclides, or other hazardous constituents, the probability is very low that hazardous substances exist at this site. Therefore, the overall qualitative risk is low.

### III. SUMMARY - Consequences of Error:

#### False negative error:

The possibility of contamination levels at this site being above risk-based limits is remote. Soil samples were collected in 1995 and analyzed for PCBs. Analysis of the data revealed non-detects for PCBs. Field sampling and visual observations of the soil showed no evidence of migration.

#### False positive error:

If further action were completed at this low risk site, funds expended could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides, and other hazardous constituents would be needed to verify the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

### IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

### Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, historical process knowledge, and results of field sampling for PCBs reveal that the risk to potential receptors would be within acceptable limits. The site is located in a remote, abandoned area with no viable pathways or receptors. There is no visual evidence of migration of contaminants. The stains appear to be contained within the road surface. Samples were collected at a depth representative of the depth of the staining, which was determined to be 0-2 inches. Vegetation adjacent to the areas of the road most visibly stained appears to be well established. Although no samples were taken for constituents other than PCBs, it is believed that this site has no significant data gaps. If hydrocarbons were present in the soil, the chemical composition would have been significantly changed by exposure to weathering processes such as photodegradation, volatilization, evaporation, hydrolysis, biotransformation, and climate and temperature fluctuations further reducing any likelihood that contaminants would be present today at levels above risk-based limits at this site.

9/23/04 Signatures: <i>Wendell P. Papp</i>	# Pages: 16	Date: August 1, 2001
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:	
Approved By: <i>Michael Hodel</i> 9-30-04	Independent Review: <i>Scott C. Rens</i> 9-28-04	

**DECISION STATEMENT  
(DOE RPM)**

Date Received:

1/14/01 ← This date was actually 2005. *MH*

Disposition:

Site 021 on road T17 is classified as no action. This determination will be recorded in the site database and listed in the 2005 Integrated 5-Year Review.

← This date was actually 2005. *MH*

Date: 1/14/01

# Pages: 1 of 1

Name: Kathleen Hain

Signature: Kathleen E Hain



DECISION STATEMENT  
(EPA RPM)

site-021

Date Received:

Disposition:

EPA concurs That no action is  
required for this site.

Date: 9-23-04

# Pages: 1

Name: Dennis Faulkner

Signature: [Signature]

**DECISION STATEMENT  
(IDEQ RPM)****Date Received:****Disposition:**

Site 021

Site 021 is stained soil areas on a dirt road (T17) that leads from Portland Avenue to the backside of the former EOCR/Security Training Facility (STF). The dirt road is stained intermittently for a distance of about 1.5 miles and the stains are 1 to 2 inches deep. There was no oil odor during the site investigation. Historically, dirt roads on the INEEL were sprayed with waste oil to dispose of the oil and control dust but this process ended after the Toxic Substances Control Act came into effect in 1976. The stains were sampled and an oil type odor was not detected during sampling. Sample results were negative for Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260, which would be the constituents of concern.

The State recommends No Further Action for this site.

**Date:**

August 12, 2004

**# Pages:****Name:**

Daryl E. Koch

**Signature:**

Daryl E. Koch

<b>PROCESS/WASTE WORKSHEET</b> <b>PROCESS: Stained Road T17</b> <b>SITE ID: 021</b> <b>WASTE: Oil-like substance</b>		
Col 1 Processes Associated With This Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Dirt access road stained with an oil-like substance	Used oils were collected from INEEL onsite sources and sprayed on dirt roads as a means of disposal or dust suppression using a large truck-mounted wand sprayer. It is suspected that the stains at Site 021 were caused by this practice.	<p><b>Artifact:</b> Stained soil</p> <p><b>Location:</b> Road T17 – dirt access road leading from Portland Avenue to the backside of former EOCR/STF</p> <p><b>Description:</b> Scattered, intermittent pattern of staining on dirt access road for a distance of approximately 1-1/2 miles. Stains visually appear to be contained within the dirt/gravel roadway. Site showed well-established vegetation along both sides of road where stains were most visible. No oil odor was detected during site investigation or sampling effort.</p>

CONTAMINANT WORKSHEET								
SITE ID: 021			WASTE: (Col 2) Oil-like substance					
PROCESS: (Col 1) Stained Road T17			Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (hi/med/low)	Col 9 Overall Reliability (high/med/low)
Aroclor 1016				Soil	ND	8.2E+001b	Low	High
Aroclor 1221				Soil	ND	2.9E+000b	Low	High
Aroclor 1232				Soil	ND	2.9E+000b	Low	High
Aroclor 1242				Soil	ND	2.9E+000b	Low	High
Aroclor 1248				Soil	ND	2.9E+000b	Low	High
Aroclor 1254				Soil	ND	2.9E+000b	Low	High
Aroclor 1260				Soil	ND	2.9E+000b	Low	High

a. ND = Non-Detect

b. Source: EPA Region III Risk-Based Concentration Table, 4/12/99 (reference 2)

Note: The analyte 2,4,5,6-Tetrachloro-m-xylene was used for surrogate recovery. Percent recovery was 98% (% recovery limits ranged from 43-124).

**Question 1. What are the waste generation processes, locations, and dates of operation associated with this site?**

**Block 1 Answer:**

Site 021 consists of stained soil areas on a dirt access road leading from Portland Avenue to the backside of EOGR/STF, stained with what appears to be some type of oil substance. The road is stained intermittently along an approximate 1-1/2 mile distance. The road is not currently open to general traffic.

Interviews with INEEL personnel revealed that historically oils were collected from various onsite sources, stored in a central collection area, and subsequently sprayed on INEEL roads as a means of disposal and dust suppression. This practice was discontinued after the Toxic Substance Control Act came into affect in 1976. It is suspected that the stains at Site 021 resulted from this practice.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Interviews with INEEL Environmental Restoration Environment Safety and Health (ER ES&H) personnel revealed that it was common practice to dispose of oil and control road dust on unpaved roads at the INEEL in this manner and suggested that the staining originated from this practice.

**Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

Interviews were conducted with ER ES&H personnel during an environmental assessment in 1994; photographs of the site and site investigations confirm the existence of stains on the road.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 4	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input checked="" type="checkbox"/> 2, 4	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 2. What are the disposal processes, locations, and dates of operation associated with this site?  
How was the waste disposed?**

**Block 1 Answer:**

Interviews with INEEL personnel revealed that historically oils were collected from various onsite sources, stored in a central collection area, and subsequently sprayed on INEEL roads as a means of disposal and dust suppression. The typical practice was to spread the oil using a truck-mounted wand sprayer directly onto the road surface until it was well coated. This practice was discontinued after the Toxic Substance Control Act came into affect in 1976. It is suspected that the stains at Site 021 resulted from this practice.

**Block 2 How reliable are the information sources? X High \_ Med \_ Low (check one)  
Explain the reasoning behind this evaluation.**

Interviews with INEEL ER ES&H personnel revealed that it was common practice to dispose of oil and control road dust on unpaved roads onsite in this manner.

**Block 3 Has this INFORMATION been confirmed? X Yes \_No (check one)  
If so, describe the confirmation.**

Interviews were conducted with INEEL ER ES&H personnel during a 1994 environmental assessment confirming this practice.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 4	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input type="checkbox"/>	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input checked="" type="checkbox"/> 4	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 3. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.**

**Block 1 Answer:**

There is no evidence that a source exists at Site 021. Site investigations reported that the dirt access road showed visual evidence of staining; however, the cause of staining was unknown. Because of the historical practice of spraying oil on the road surface, there was concern that PCBs from transformers might have been in the oil used to spray Road T17. Two composite soil samples were collected at Site 021 on April 3, 1995. The sample logbook listed the sample location as approximately four-tenths of a mile off the main road (Portland Avenue) and then 90 ft beyond on both sides and the middle of the road. Samples were collected at the five areas most visibly stained on the road. The Sampling and Analysis Plan required "the depth of sampling to be representative of the depth of the stain, but no deeper than one foot." The sample logbook reported that samples were collected at 0-2 inches in depth. The sample logbook reported that the soil showed very little rock, was medium to dark brown, silty clay, and no oil odor was detected. No record of field screening at the time of sampling was noted.

The soil samples were analyzed for PCBs on April 14, 1995. The data were validated at Method Validation Level B. Results of the analysis revealed non-detects for PCBs in both samples. The samples were not analyzed for organics, metals, radionuclides, or other hazardous constituents. It was determined that the potential risk was for PCB contamination, and that if other hazardous constituents were present, they would likely be at levels below risk-based limits.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Discussions were held with INEEL ER ES&H personnel familiar with past practices at the INEEL. Samples were representative of the depth of the stain and no oil odor was noted at time of sampling. Validated sampling and analysis results reported that PCBs were non detectable in the soil samples.

**Block 3 Has this information been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

Interviews were held with INEEL ER ES&H personnel, and data collection was noted in the sample logbook. Results were provided in the data analysis report confirming no detection of PCBs in the soil samples.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input checked="" type="checkbox"/> 4	Documentation about data	<input checked="" type="checkbox"/> 7,8
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input type="checkbox"/>	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 1		

**Question 4. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?**

**Block 1 Answer:**

There is no evidence of migration. Site investigations reveal that the stains appear visually to be contained within the roadway. There is no evidence of stained or discolored soil areas beyond the roadway. There is no visual evidence of disturbed vegetation adjacent to the roadway. Photographs of the road show green, well established vegetation directly adjacent to the stained areas along both sides of the road.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Visual site inspections and recent photographs of the road show that vegetation is well established along the road and there is no evidence of stains in the areas directly off the roadway.

**Block 3 Has this information been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

Site inspections revealed no visual evidence of migration. Photographs were taken in 1994 and 1999 of the site show well established vegetation along both sides of the road in the stained areas.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input type="checkbox"/>	Documentation about data	<input checked="" type="checkbox"/> 7
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		



**Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?**

**Block 1 Answer:**

Interviews with INEEL personnel revealed that oils were sprayed on INEEL roads from the back of a tanker truck. A wand-type series of nozzles spread the oil directly onto the road surface in a broad spray pattern until the road was well coated. Site investigations and photographs indicate that the road is stained intermittently for a distance of approximately 1-1/2 miles. The sample logbook reported that stains were collected at a depth of 0-2 in. in the five areas showing the most stain in an estimated 20 ft wide and 90 ft long area.

There is no expected pattern of contamination from PCBs because sampling revealed non-detects in the soil samples collected at this site. The pattern of potential contamination for organics, metals, radionuclides or other hazardous constituents cannot be estimated without further field screening or sampling, however, it is highly unlikely that these contaminants would be present at levels above risk-based limits.

**Block 2 How reliable are the information sources?   High X Med   Low (check one) Explain the reasoning behind this evaluation.**

This estimate was derived from the information contained in the sample logbook and visual appearance of the stained areas observed during the site investigations. Photographs were also used to estimate the size of the stained area.

**Block 3 Has this information been confirmed? XYes   No (check one)  
If so, describe the confirmation.**

Sample logbook, site investigation documentation and photographs of the site provide information for this estimate. The data analysis revealed no detection of PCBs in the soil samples collected at this site.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input type="checkbox"/>	Documentation about data	<input checked="" type="checkbox"/> 7,8
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 1		

**Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.**

**Block 1 Answer:**

Site investigations and photographs indicate that the road is stained intermittently for a distance of approximately 1-1/2 miles. The sample logbook reported that stains were collected at a depth of 0-2 in. in the five areas showing the most stain in an estimated 20 ft wide and 90 ft long area.

There does not appear to be a source at this site or contaminated region to estimate because sampling revealed no detection of PCBs in the soil samples collected at the site. The estimated volume of contamination for organics, metals, radionuclides or other hazardous constituents cannot be estimated without further field screening or sampling; however, it is highly unlikely that these contaminants would be present at levels above risk-based limits.

**Block 2 How reliable are the information sources? \_\_High ☒ Med \_\_Low (check one)**  
**Explain the reasoning behind this evaluation.**

Sample analysis for PCBs revealed there was no source of contamination present. The estimated volume of contamination for other constituents cannot be estimated without further field screening or sampling for organics, metals, radionuclides, or other hazardous substances.

**Block 3 Has this INFORMATION been confirmed? \_\_Yes ☒ No (check one)**  
**If so, describe the confirmation.**

Sample analysis confirmed there was no source of contamination present for PCBs. Other hazardous constituents cannot be confirmed with existing information.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input type="checkbox"/>	Documentation about data	<input checked="" type="checkbox"/> 7
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 1		

**Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.**

**Block 1 Answer:**

The estimated quantity of hazardous substances/constituents at this site is near zero because analysis for PCBs revealed non-detects in the two composite soil samples collected. The estimated volume of contamination for organics, metals, radionuclides or other hazardous constituents cannot be estimated without further field screening or sampling; however, it is highly unlikely that these contaminants would be present at levels above risk-based limits.

**Block 2 How reliable are the information sources? \_\_High ☒ Med \_\_Low (check one)**  
**Explain the reasoning behind this evaluation.**

Sample analysis for PCBs revealed there was no source of contamination present. The estimated volume of contamination for other constituents cannot be estimated without further field screening or sampling.

**Block 3 Has this INFORMATION been confirmed? \_\_Yes ☒ No (check one)**  
**If so, describe the confirmation.**

Sample analysis confirmed there was no source of contamination present for PCBs. Other hazardous constituents cannot be confirmed with existing information.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input type="checkbox"/>	Documentation about data	<input checked="" type="checkbox"/> 7
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
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Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 1,10		

**Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.**

**Block 1 Answer:**

There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. Although there is visible staining on the road, sampling analysis revealed that no PCBs are present at detectable levels. No field screening or sampling has been conducted at this site for organics, metals, radionuclides, or other hazardous constituents. However, given the length of time since the road may have been sprayed with oil, the chemical composition of the hydrocarbon substance could have undergone significant changes. Exposure to weathering processes such as evaporation, volatilization, photolytic loss, hydrolysis, biotransformation, and climate and temperature fluctuations could further reduce any likelihood that contaminants would be present today at levels above risk-based limits at this site.

**Block 2 How reliable are the information sources? High X Med Low (check one)**  
**Explain the reasoning behind this evaluation.**

This evaluation is based on sample analysis, historical process information, site visitations, and photographs. Stains visually appear to be contained within the road surface; vegetation adjacent to the roadside appears to be well established. Sampling analysis revealed there was no detection of PCBs in the composite soil samples.

**Block 3 Has this INFORMATION been confirmed? XYes No (check one)**  
**If so, describe the confirmation.**

Laboratory analysis confirmed no detection of PCBs in the samples. Photographs and site visitations confirmed there was no visual evidence of migration from the road.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input checked="" type="checkbox"/> 7
Anecdotal	<input type="checkbox"/>	Documentation about data	<input checked="" type="checkbox"/> 7
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 5	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 6
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 1,9,10		

## REFERENCES

1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
2. Decision Document Package, Track 1: Security Training Facility, INEEL, June 1999.
3. EPA Regional III Risk-Based Concentration Table for PCBs; 4/12/99.
4. Interviews between Scott Lebow, Environmental Baseline Assessment team member, and Robert Montgomery ER ES&H, EG&G Idaho, Inc. re: practice of spraying oils on INEEL dirt roads for dust suppression, July 1994.
5. Photographs of Site #021: PN94-0778-1-6, PN94-0778-1-7, PN94-0778-1-8, And PN99-0424-1-16.
6. FY1999 WAG 10 Newly Identified Sites, Volumes I and II.
7. Memorandum from R. S. Rice to S. M. Burns re: Closure Report for the Sampling of INEL Roads for PCBs; EMS-114-94/RSR-68-95, May 22, 1995.
8. Memorandum regarding sampling of suspected PCB contaminated roads – Donna Haney, INEEL, April 3, 1995.
9. Pollard, Simon J.T., Steve E. Hrudey, and Phillip M. Fedorak. Waste Management & Research, *Bioremediation of Petroleum-and-Creosote-Contaminated Soils: A Review of Constraints*, 1994.
10. Agency for Toxic Substances and Disease Registry, Public Health Statement, RE: PCBs, June 1989.

